

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

APPLE, INC., a California
Corporation,

HONORABLE JANET T. NEFF
U.S. District Judge

Plaintiff,

vs

Case No: 1:08-cv-597

NICHOLAS WOODHAMS, an
Individual,

Defendant.

**DEFENDANT'S ANSWER TO PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY
TRIAL AND AFFIRMATIVE DEFENSES**

NOW COMES the Defendant, NICHOLAS WOODHAMS, by and through his attorneys, LEVINE & LEVINE, and for his Answer to Plaintiff's Complaint and Demand for Jury Trial states as follows:

1. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

2. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs.

3. Admitted.

4. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his

right against self-incrimination under the Fifth Amendment to the United States Constitution.

5. Admitted.

6. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

7. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

8. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

9A. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

9B. Neither admitted nor denied for lack of information

sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

10. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

11. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

12. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

13. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

14. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

15. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

16. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

17. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

18. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the

United States Constitution.

19. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

20. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs.

21. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs.

22. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs.

23. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

24. No response required.

25. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his

right against self-incrimination under the Fifth Amendment to the United States Constitution.

26. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

27. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

28. No response required.

29. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

30. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

31. Neither admitted nor denied for lack of information

sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

32. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

33. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

34. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

35. No response required.

36. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the

United States Constitution.

37. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

38. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

39. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs. Further, Defendant asserts his right against self-incrimination under the Fifth Amendment to the United States Constitution.

40. Neither admitted nor denied for lack of information sufficient to form a belief as to the truth of the allegations and Plaintiff is left to its proofs.

WHEREFORE Defendant prays that this Honorable Court dismiss this action and award him costs.

LEVINE & LEVINE

Dated: July 8, 2008

By: /s/
 RANDALL S. LEVINE (P30672)
 Attorney for Defendant

